

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Matthew Roth  
Task Force Officer: Jaclyn Kocis-ManiaciTelephone: (313) 226-9186  
Telephone: (313) 202-3640

6

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

MICHAEL HINDS

Case: 2:17-mj-30649  
Assigned To : Unassigned  
Assign. Date : 11/30/2017  
Description: CMP USA V HINDS  
(BG)

**CRIMINAL COMPLAINT**

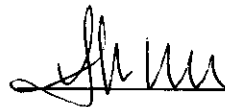
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 23, 2017 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. Section 924(c)	Carrying a Firearm During and in Relation to a Drug Trafficking Offense
21 U.S.C. Section 841(a)(1)	Possession of a Controlled Substance with Intent to Distribute
18 U.S.C. Section 922(g)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.



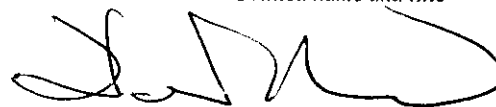
*Complainant's signature*

Jaclyn Kocis-Maniaci, ATF Task Force Officer  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: 11/30/2017

City and state: Detroit, Michigan



*Judge's signature*

David R. Grand, United States Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT**

I, Task Force Officer Jaclyn Kocis-Maniaci, being first duly sworn, hereby depose and state as follows:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. I am a police officer with the City of Detroit. I have been with the Detroit Police Department since 2003. I became a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in January of 2017.

2. I make this affidavit from personal knowledge based on my participation in this investigation. The information comes from witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This affidavit is for the limited purpose of establishing probable cause and does not contain all details or facts known to law enforcement related to this investigation.

**II. PROBABLE CAUSE**

4. The ATF is conducting a criminal investigation concerning Michael HINDS (DOB XX/XX/1983), for violations of 18 U.S.C. § 922(g)(1)

(felon in possession of a firearm), 21 U.S.C. § 841(a)(1) (possession of a controlled substance with intent to distribute), and 18 U.S.C. § 924(c), (use and carrying of a firearm during or in relation to a drug trafficking offense).

5. On November 23, 2017, Detroit Police Department Officers were traveling in a marked traffic patrol car. During patrol, they observed three occupants in a smoke filled vehicle, parked on the street, in front of a vacant dwelling. Officers stopped to investigate.

6. The passenger was Michael HINDS. The officers approached the car and observed HINDS in the process of rolling loose marijuana in a white piece of folded up printer paper. HINDS informed the officers that he had a medical marijuana card. Officers informed <sup>HINDS JEM DR</sup> ~~HINES~~ that he was not transporting his marijuana correctly. The officers asked the occupants to step out of the vehicle.

7. A search of the vehicle revealed a cloth lunch bag on the front passenger floorboard where <sup>HINDS JEM DR</sup> ~~HINES~~ was sitting. Inside the lunch bag were the following items:

- a. Numerous knotted plastic sandwich bags of crack cocaine;

- b. Heroin chunks;
- c. Prescription vials containing loose marijuana;
- d. Prescription vials that were empty;
- e. One digital scale; and
- f. One Crown City Arms, model 1911, .45 caliber pistol, serial number R05518.

8. HINDS admitted that everything in the lunch bag was his and that the other occupants did not have anything to do with the items recovered from the lunch bag.

9. On November 24, 2017, a computerized criminal history check showed that HINDS has the following felony convictions:

- a. 2002 - armed robbery, 3rd Circuit Court, Detroit, Michigan;
- b. 2016 - delivery / manufacturing a controlled substance, 16th Circuit Court, Mt Clemens, Michigan;
- c. 2016, delivery / manufacturing a controlled substance, 16<sup>th</sup> Circuit Court, Mt. Clemens, Michigan;
- d. 2017 - delivery / manufacturing a controlled substance, 16<sup>th</sup> Circuit Court, Mt. Clemens, Michigan.

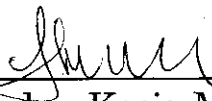
10. On November 24, 2017, a State of Michigan Law Enforcement Information Network (LEIN) query was conducted on the Crown City Arms, model 1911, 45 pistol. Query results returned a record that this firearm was reported stolen.

11. On November 30, 2017, Special Agent David Salazar advised Affiant, based upon the verbal descriptions provided, without physically examining the firearm, that the referenced firearm is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the state of Michigan after 1989, and therefore had traveled in and affected interstate commerce.

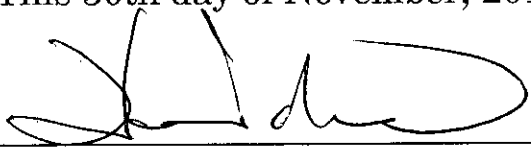
### **III. CONCLUSION**

12. Probable cause exists that Michael HINDS, a convicted felon, did knowingly possess a firearm that had previously traveled in interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1). Additionally,

HINDS violated 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 924(c) by possessing controlled substances with intent to distribute and carrying a firearm during or in relation to a drug trafficking offense.

  
Jaclyn Kocis-Maniaci, Task Force Officer  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to and subscribed before me  
This 30th day of November, 2017.

  
HON. DAVID R. GRAND  
UNITED STATES MAGISTRATE JUDGE